

**PD-0108-20 and PD-0109-20**

**In the  
Court of Criminal Appeals of Texas  
At Austin**

FILED  
COURT OF CRIMINAL APPEALS  
7/31/2020  
DEANA WILLIAMSON, CLERK

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**Appellate No. NO. 09-18-00218-CR and NO. 09-18-00219-CR**

**In the Court of Appeals for the Ninth District**

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**Bradley Jacobs Shumway, *Appellant***

**v.**

**The State of Texas, *Appellee***

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**APPELLANT'S MOTION TO EXTEND TIME TO FILE BRIEF**  
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## **Motion To Extend Time to File Brief**

Appellant, Bradley Jacobs Shumway, moves for an extension of time to file his brief:

### I.

This is an appeal from the 435th District Court of Montgomery County in which the Court of Criminal Appeals granted discretionary review on July 1, 2020. Movant's brief is currently due July 31, 2020. Movant seeks his first extension of at least 30 days to file his brief, no previous extension has been granted.

### II.

An extension is needed for the following reasons:

1. The COVID-19 pandemic has made it difficult to communicate with Mr. Shumway and his family.
2. The month of July is counsel's possessory period for his child and the COVID-19 pandemic situation has made it difficult to work efficiently, take care of his child, and coordinate childcare.
3. Counsel is a solo practitioner and has been involved in or prepared for the following criminal trials, appeals or writs:
  - (A) *State of Texas v Larry Breax*, 75<sup>th</sup> District Court, #CR 34668, 34669, 34670, Multiple Sexual Offenses
  - (B) *State of Texas v Jason Gold Smith*, 9<sup>th</sup> District Court, #18-11-1453, Murder
  - (C) *State of Texas v. Daniel Subach*, 9<sup>th</sup> District Court, #19-06-07996 & 19-06-08653, Assault Family Violence, Poss. of Bomb Components.

(D) *Michael Lollis v. State of Texas*, the 9th Court of Appeals, Appellate 09-18-00430-CR.

(E) *David Allyn Sweat v. State of Texas*, 1<sup>st</sup> Court of Appeals Appellate No 01-18-00390-CR

Movant respectfully asks that the Court grant his Motion To Extend Time to File his Brief.

Respectfully submitted,

/s/ Richard Martin P. Canlas

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and complete copy of this Motion on the 31st day of July 2020, was electronically served by efile service on the following:  
Via Efile service to The Montgomery County District Attorney's Office, Bill Delmore.  
Via Efile service to Ms. Stacey M. Soule, State's Prosecuting Attorney.

/s/ Richard Martin P. Canlas

Richard Martin P. Canlas  
Attorney for Appellant

### **Automated Certificate of eService**

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Associated Case Party: BRADLEYJACOBSSHUMWAY

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